

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,	:	
	:	
PLAINTIFF,	:	
	:	
v.	:	CIVIL NO. 24-cv-1524
	:	
\$66,600.00 IN UNITED STATES	:	
CURRENCY,	:	
	:	
DEFENDANT.	:	

VERIFIED COMPLAINT FOR FORFEITURE

The United States of America, by and through its attorneys, Rachelle Aud Crowe, United States Attorney for the Southern District of Illinois, and Adam E. Hanna, Assistant United States Attorney, states as follows:

1. This is a civil action *in rem* brought to enforce the provisions of 21 U.S.C. § 881(a)(6) for the forfeiture of property which constitutes money furnished or intended to be furnished by a person in exchange for a controlled substance, or proceeds traceable to such an exchange, or money used to facilitate a violation of 21 U.S.C. §§ 801 *et seq.*

2. This Court has subject-matter jurisdiction over this matter by virtue of 28 U.S.C. § 1345, *in rem* jurisdiction by virtue of 28 U.S.C. § 1355, and venue by virtue of 28 U.S.C. § 1395(b).

3. The defendant property is \$66,600.00 in United States Currency.

4. The defendant property was seized on or about February 9, 2024, during a traffic stop on Interstate 270 westbound in Madison County, Illinois.

5. The property consists of currency which has been deposited in the account of Assets Forfeiture Fund, U.S. Treasury Account c/o Federal Reserve Bank located in St. Louis, Missouri.

6. The facts and circumstances supporting the seizure and forfeiture of the defendant property are contained in Exhibit A. The attached Affidavit and all 51 additional paragraphs are

reincorporated here as if alleged herein and require a responsive pleading to each separate averment contained therein.

7. The defendant property constitutes property furnished or intended to be furnished by a person in exchange for a controlled substance, or proceeds traceable to such an exchange, or property used to facilitate a violation of 21 U.S.C. §§ 801 *et seq.* and is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

8. The property is already in the possession, custody, and control of the United States.

WHEREFORE, the United States of America respectfully requests that a Warrant and Summons for Arrest of Articles *In Rem* be issued for the \$66,600.00 in United States Currency; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant property to be forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and proper, together with the costs and disbursements of this action.

Respectfully submitted,

RACHELLE AUD CROWE
United States Attorney

/s/ Adam E. Hanna
ADAM E. HANNA
Assistant United States Attorney
Nine Executive Drive
Fairview Heights, Illinois 62208
(618) 628-3700

DECLARATION

I am a Task Force Officer with the Drug Enforcement Administration, and the agent assigned the responsibility for this case.

I have read the contents of the foregoing complaint for forfeiture and the exhibits thereto, and the statements contained therein are true to the best of my knowledge and belief.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury the foregoing is true and correct.

Executed on this 18th day of June, 2024.

/s/ Brandon Smiley w/consent
BRANDON SMILEY
Task Force Officer
Drug Enforcement Administration